

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Drema O'Dell,

Chapter 7

Debtor(s)

CASCADE FUNDING RM I ALTERNATIVE
HOLDINGS, LLC

NO 22-12578 AMC

Creditor

11 U.S.C. § 362

vs.

Drema O'Dell,

Debtor(s)

Gary F. Seitz, Esq.,

Trustee

NOV 14 2022

**APPLICATION FOR RELIEF
DEBTOR'S APPLICATION FOR AN EXTENSION OF TIME
TO RESPOND TO OR ANSWER THE CREDITOR'S
MOTION FOR RELIEF FROM STAY**

The Debtor has the meeting of creditors scheduled for November 17, 2022 and needs time to properly prepare for that. The Debtor has the response to this Court's Rule to Show Cause scheduled for November 30, 2022, and the Debtor requires time to prepare for that.

The Debtor also has meritorious defenses to present in an answer to the Creditor's motion for relief from the stay, and the Debtor requires time to properly prepare that answer to the Creditor's motion.

Respectfully, the Debtor requests that the period for the Debtor to file the Answer to the Creditor's Motion For Relief From stay be extended by thirty days,

to the first available date after December 17, 2022 and that any hearing be continued for thirty days to the next available date after the Answer is due.

Respectfully submitted:

A handwritten signature in black ink, appearing to read "Drema O'dell".

Drema O'dell
Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Application for Relief have been served on November 12, 2022, by first class mail, postage prepaid upon those listed below:

Trustee:

Gary F. Seitz, Esq.

Gellen Scali Busenkell & Brown LLC

8 Penn Center, 1628 John F. Kennedy Blvd., Suite 1901

Philadelphia, PA 19103

Office of the United States Trustee

Robert N.C. Nix Federal Building

900 Market Street, Suite 320

Philadelphia, PA 19107

Denise Carlon, Esquire

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Attorney for Creditor

Respectfully submitted:



Drema O'dell
Pro Se
P.O. Box 205
Edgmont, PA 19028
267-418-5177

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ORDER
~~CERTIFICATE OF SERVICE~~

AND NOW, this _____ day of November, 2022, upon the Debtor's Application for Relief requesting an extension of time in which to answer the Creditor's Motion for Relief From Stay, and any response thereto, it is hereby ORDERED and DECREED that the Application for Relief is GRANTED.

The Debtor's responses to the Creditor's motion shall be due on or before _____, 2022. The hearing on the Creditor's motion shall be on _____, 2022.

BY THE COURT:

J.